



United States
Department of
Agriculture

Animal and Plant Health
Inspection Service

Veterinary Services

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EXHIBIT 3
DATE 3/19/09
SB 337

March 17, 2009

Martin Zaluski
State Veterinarian
Montana Department of Livestock
Animal Health Division
P.O. Box 202001
Helena, MT 59620-2001

Dear Dr. Zaluski:

The purpose of this letter is to assure all parties that APHIS has mitigation measures in place to minimize the possibility of brucellosis infection in bison graduating from the Bison Quarantine Feasibility Study (BQFS).

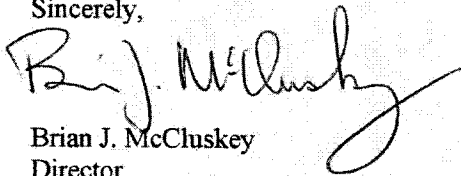
Bison graduating from the BQFS have fulfilled all requirements of the protocol and are considered negative for brucellosis in accordance with the Brucellosis Eradication Uniform Methods and Rules (UM&R), effective October 1, 2003. This publication includes the minimum standards of the Cooperative State-Federal Brucellosis Eradication Program. These UM&R contain minimum standards for certifying herds, classifying states and areas, and detecting, controlling, and eradicating brucellosis, as well as minimum brucellosis requirements for the intrastate and interstate movement of cattle and bison.

The protocol has additional safeguards to further minimize the risk of infection both within and outside of the herd.

1. Once the animals are relocated to the recipient's site, protocol requires an additional 5 years of monitoring and testing.
2. The bison herd is required to remain a closed herd for 5 years with no contact with other bison or cattle.
3. The bison herd will be designated a "research herd" which specifies that for the first 5 years after relocation, should the bison herd develop brucellosis it would not jeopardize the State's brucellosis status.

USDA has pledged its full cooperation to protect the economic viability of the livestock industry in Montana and the remainder of the United States by eliminating brucellosis in cattle herds while sustaining populations of free-range wild elk and bison in the Greater Yellowstone Area. These dual goals are only attainable with continued and improved cooperation between Federal and State agencies, Tribal groups, and livestock owners. This study and its completion of disease-free bison being relocated to another State is one example of this pledge.

Sincerely,


Brian J. McCluskey
Director



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Protocol for the monitoring and surveillance of herd groups of bison during the first five years after translocation from the Bison Quarantine Feasibility Study.

If brucellosis testing remains negative for the first group of bison cows calving in the summer of 2008, a group of cows, calves, and bulls will be available for translocation to tribal or public properties remote from the GYA in winter 2008/09. That first group will likely be comprised of approximately 20 to 25 cows and their calves and 2 to 4 bulls. The cows will be exposed to bulls in 2008 and will be due to calve in Spring/Summer of 2009. The recipient tribe or agency will maintain them in one or more fenced pastures, approved by Federal and State animal health officials, on site until fall of 2009. During winter and spring, bison will be observed daily for abortions. Any aborted fetuses will be reported immediately to investigators and submitted to the state veterinary diagnostic laboratory for an abortion work-up and *Brucella* culture. In the fall of 2009, all bison (cows, yearlings and calves) will be worked through a chute and blood samples collected for brucellosis serology testing. If animals are negative on serology, fences can be removed and the animals allowed to range.

Serologic tests will include the following: fluorescence polarization assay, standard card, standard tube, standard plate, complement fixation, rivanol, and BAPA. Interpretation of tests will be done by the designated brucellosis epidemiologist and the regional epidemiologist.

Assuming an approximate 50% male/50% female calf crop each year and assuming that the slight majority of females will first breed as two-year-olds to calve as 3-year-olds and that animals will calve every year thereafter, it is anticipated that approximately 75 bison will be tested in 2009, and the maximum population in the following 4 years will be: 2010 - 100; 2011 - 135; 2012 - 183; and 2013 - 244.

As part of the requirements of the project to ensure that latent infection is not present in the translocated bison, it is necessary to monitor the population for 5 years following translocation. During the first year (2009) every animal will be serologically tested as described above. Thereafter, a percentage of adult or adolescent bison will be tested. Using a calculation to determine a 5% or greater prevalence with 95% confidence, a figure of 45 to 53 bison will need to be tested each year as the population grows. Animal capture can be accomplished by setting up a trap and working them through a chute or by chemical immobilization delivered by dart, or by helicopter capture or a combination of techniques.

Should serologically positive animals be detected in 2009 or subsequent years, the positives will be sacrificed, necropsied, and specimens collected for culture. If *B. abortus* infection is confirmed, whole-herd testing will be necessary. With results of the whole-herd test, a disease management plan will be developed in cooperation with the recipient agency or tribe, the State Veterinarian's office, and APHIS epidemiologists. Depending on testing results, the disease management plan may consist of vaccination and rigorous test and slaughter, to whole herd depopulation.

It is anticipated that if the translocated herds remain seronegative for 5 years following quarantine, continued regular monitoring will not be required.